

IN RE:	:	
LUIS CARLOS VERDECIAS	:	BK. No. 5:14-02094 RNO
LORETTA A. ADAMS-VERDECIAS	:	
Debtors	:	Chapter No. 13
	:	
CITIMORTGAGE, INC.	:	
Movant	:	
v.	:	
LUIS CARLOS VERDECIAS	:	11 U.S.C. §362
LORETTA A. ADAMS-VERDECIAS	:	
Respondents	:	

It is hereby stipulated by and between Phelan Hallinan Diamond & Jones, LLP, counsel for the Movant, CITIMORTGAGE, INC. and RANDALL W. TURANO, Esquire, counsel for the Debtors, as follows:

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Should the Debtors fail to bring the loan contractually current, Movant shall send Debtors and counsel a written Notice of Default of this Stipulation. If the default is not cured within ten (10) days of the date of the Notice, counsel shall file a Certification of Default with the Court and the Court shall enter an Order granting relief from the Automatic Stay waiving FED. R. Bankr. P. 3002.1 and waiving Rule 4001 (a)(3) so that the Relief Order is immediately effective and enforceable.


8. Debtors' tendering of a check to **CITIMORTGAGE, INC.**, which is subsequently returned due to insufficient funds in the account upon which the check is drawn, shall not constitute payment as the term is used in this Stipulation.

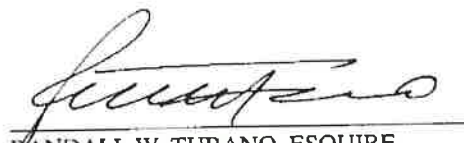
9. The parties stipulate that Movant shall be permitted to communicate with the Debtors and Debtors' Counsel to the extent necessary to comply with applicable non-bankruptcy law.

10. This stipulation survives any loan modification agreed to and executed during the instant bankruptcy. If any regular monthly mortgage payment due after the execution of a loan modification is more than fifteen (15) days late, Movant shall send Debtors and counsel a written Notice of Default of this Stipulation. If the default is not cured within ten (10) days from the date of the Notice, counsel may file a Certification of Default with the Court and the Court shall enter an Order granting relief from the Automatic Stay and waiving Rule 4001(a)(3) so that Relief Order is immediately effective and enforceable.

11. The parties agree that a facsimile signature shall be considered an original signature.

Date: October 19, 2016

  
Jay B. Jones, Esq.  
Jerome Blank, Esq.  
Andrew L. Spivack, Esq.  
James P. Shay, Esq.  
Michael Dingerdissen, Esq.  
Attorneys for Movant

  
RANDALL W. TURANO, ESQUIRE  
Attorney for Debtor